

### REMARKS/ARGUMENTS

This Amendment is in response to the Office Action mailed July 16, 2008. Claims 1-11 and 13-69 were pending in the present application. This Amendment amends claims 1, 21, 34, 44, 51, 61, 68, and 69; and cancels claims 10, 28, 40, 48, 57, and 65; leaving pending in the application claims 1-9, 11, 13-27, 29-39, 41-47, 49-56, 58-64, and 66-69. Reconsideration of the rejected claims is respectfully requested.

#### **I. . Rejection under 35 U.S.C. §103**

Claims 1-11, 13-14, 17-30, 33-41, 43-49, and 51-58 are rejected under 35 U.S.C. §103(a) as being obvious over *Chiu* (US 7,051,271) in view of *Hull* [Document image similarity and equivalence protection] and *Bozdagi* (US 6,647,535). Applicants respectfully submit that these references do not teach or suggest each element of these claims.

For example, Applicants' claim 1 as amended recites a method in a computer system for creating a composite electronic representation including presentation material information, the method comprising:

- scanning a paper document to generate an electronic representation of the document, the document including presentation material;
- extracting a visual feature from the electronic representation of the document, the visual feature corresponding to at least a portion of the presentation material;
- accessing recorded information including at least one of audio and visual information recorded during a presentation of the presentation material, whereby at least a portion of the recorded information matches a feature portion of the presentation material, and comparing the visual feature to the recorded information to determine a portion of the recorded information that matches the visual feature, and determining matching information for each recorded portion of the recorded information and feature portion using a matching algorithm configured to map the visual feature to a portion of any of a plurality of recorded information that matches the feature portion;
- generating a user selectable object providing a user with access to the portion of the recorded information determined to match the visual feature, and inserting the user selectable object into the electronic representation of the document when the computer system locates a portion of the recorded information determined to match the visual feature, the computer system thus creating a composite electronic representation of the document including the user selectable object and metadata including the matching information, the user selectable object being placed in a position associated with the extracted feature and allowing the user to access the portion of the recorded information in an application displaying the composite electronic representation or a separate application by selecting the user selectable object, the user-selectable object being able to access the portion of the recorded information using the metadata in the composite document; and

storing the composite electronic representation for access by the user or another user  
accessing the composite electronic document

(*emphasis added*). Such limitations are neither taught nor suggested by these references.

For example, as discussed of record *Chui* teaches a system for generating links between a scanned document and a segment of video matching the scanned document (col. 2, lines 15-17; abstract). Coefficients of an image of the document and coefficients of representative video frames are compared, and when the coefficients match within a predetermined threshold the document is linked or indexed to the video frame (col. 6, lines 5-45). As recognized in the Office Action, *Chui* does not teach or suggest "comparing the visual feature to the recorded information to determine a portion of the recorded information corresponding to the visual feature, whereby at least a portion of the recorded information corresponds to a feature portion of the presentation material" (OA p. 7). As such, *Chui* cannot render these claims obvious.

To make up for some of the deficiencies in *Chui*, *Hull* is cited as teaching comparing two images to determine their visual similarity and whether they are equivalent (OA p. 7). Even assuming such teaching and a motivation to combine, for sake of argument, such a combination still would not teach or suggest "comparing the visual feature to the recorded information to determine a portion of the recorded information that matches the visual feature, and determining matching information for each matching portion of the recorded information and feature portion using a matching algorithm configured to map the visual feature to a portion of any of a plurality of recorded information that matches the feature portion" as recited in Applicants' claim 1 as amended. Further, the Office Action recognizes that a combination of *Chui* and *Hull* still would not teach or suggest "generating a user selectable object providing a user with access to the portion of the recorded information corresponding to the visual feature, and inserting the user selectable object into the electronic representation of the document when the computer system locates a portion of the recorded information corresponding to the visual feature" (OA p. 8). As such, a combination of *Chui* and *Hull* would not render obvious Applicants' claim 1.

To make up for some of the deficiencies in *Chui* and *Hull*, *Bozdagi* is cited as teaching storyboarding in real time and near-real time using a GUI that allows a user to visually interact with an input video signal to determine the key or representative frames, or to retrieve video

segments associated with already determined key frames, and a compilation of representative images can be generated (OA pp. 8-9).

Similar to *Chui* and *Hull* as discussed above, *Bozdagi* does not teach or suggest "comparing the visual feature to the recorded information to determine a portion of the recorded information that matches the visual feature, and determining matching information for each matching portion of the recorded information and feature portion using a matching algorithm configured to map the visual feature to a portion of any of a plurality of recorded information that matches the feature portion" as recited in Applicants' claim 1 as amended. Further, *Bozdagi* does not teach or suggest, either individually or in combination with *Chui* and *Hull*, "computer system thus creating a composite electronic representation of the document including the user selectable object and metadata including the matching information" where the user-selectable object is able to access the portion of the recorded information using the metadata in the composite document" as recited in Applicants' claim 1 as amended. A primary aim of *Bozdagi* is to represent images and corresponding contents of a conversation in a story in data, where the image and contents correspond to a pair and one image corresponds to one set of conversation data. Applicants' claim 1, however, is able to use a matching algorithm to match a visual feature to a portion of any recorded information that matches the visual feature, and can generate metadata to be stored in the composite document that provides access to the matching portion(s). Even if there were a motivation to combine *Bozdagi* with *Chui* and *Hull*, the resulting combination would not teach or suggest such limitations, or provide such functionality. Accordingly, these references cannot render obvious Applicants' claim 1 or the claims that depend therefrom. The other claims recite limitations that similarly are not taught or suggested by these references for reasons including at least some of those set forth above.

Claims 15-16, 31-32, 42, 50, and 59 are rejected under 35 U.S.C. §103(a) as being obvious over *Chiu*, *Hull*, and *Bozdagi* and further in view of *Coar* (US 2007/0106932). These claims are not rendered obvious by *Chiu*, *Hull*, and *Bozdagi* as discussed above. *Coar* does not make up for the deficiencies in these references with respect to these claims.

As discussed of record, *Coar* teaches creating an electronic container that includes a plurality of documents and meta information about the documents, wherein a graphical code (such as a bar code) is used to assist in extracting information about the documents in the electronic container, thus providing information that is in a machine-readable form (paragraphs [0065], [0023]). Such an approach allows a standard encoding approach to be used to provide an enhancement for computer generated paper documents that "cannot have a machine readable symbol included at the time of printing" (paragraph [0024]). *Coar* uses XWPL - an eXtensible Workflow Markup Language - to place information into a machine-readable symbol such as a high-density bar code (paragraph [0067]). When documents are placed into a container such as a "VirPack" of *Coar*, the information in the symbol can include index data and unique field level properties for each document, so that each document can be located in a hierarchical tree of a VirPack, and documents can be automatically placed in a correct VirPack in the correct placement in the hierarchical tree using information in the symbol (paragraphs [0069], [0072], [0073], [0086]).

*Coar* does not, however, teach or suggest limitations of Applicants' claims such as "comparing the visual feature to the recorded information to determine a portion of the recorded information that matches the visual feature, and determining matching information for each matching portion of the recorded information and feature portion using a matching algorithm configured to map the visual feature to a portion of any of a plurality of recorded information that matches the feature portion", or the "computer system thus creating a composite electronic representation of the document including the user selectable object and metadata including the matching information" where the user-selectable object is able to access the portion of the recorded information using the metadata in the composite document" as recited in Applicants' claim 1 as amended. *Coar* does not teach or suggest using a matching algorithm to match a visual feature to a portion of any recorded information that matches the visual feature, and generating metadata to be stored in the composite document that provides access to the matching portion(s). Even if there were a motivation to combine *Coar* with *Chui*, *Hull*, and *Bozdagi*, the resulting combination would not teach or suggest such limitations, or provide such functionality.

Accordingly, these references cannot render obvious any of Applicants' claims, including claims 15-16, 31-32, 42, 50, and 59.

For at least these reasons, Applicants respectfully request that the obviousness rejections with respect to these claims be withdrawn.

## **II. Amendment to the Claims**

Unless otherwise specified or addressed in the remarks section, amendments to the claims are made for purposes of clarity, and are not intended to alter the scope of the claims or limit any equivalents thereof. The amendments are supported by the specification and do not add new matter.

### **CONCLUSION**

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 925-472-5000.

Respectfully submitted,



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